

RE: TYLER J VARGAS

) Case No. 19 B 36053
)
Debtor) Chapter 13
)
) Judge: JACQUELINE P COX

NOTICE OF MOTION

TYLER J VARGAS

DAVID M SIEGEL

via Clerk's ECF noticing procedures

4336 W 183RD ST

COUNTRY CLUB HILLS, IL 60478

Please take notice that on March 23, 2020 at 10:30 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on February 12, 2020.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On December 23, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Missing 2015 and 2016 taxes; amend plan - #2.3 - check last box add submit language; amend I - no prorated listed and show new job/income.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

/s/ Tom Vaughn

TOM VAUGHN

CHAPTER 13 TRUSTEE

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